UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAY 11 2016

CERTIFIED MAIL #7001 0320 0006 1452 2614
RETURN RECEIPT REQUESTED

Rick Hersemann, Physical Scientist
Office of Science
Fermi Site Office
Post 0ffice Box 2000
Batavia, Illinois 60510

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – Fermi National Accelerator Laboratory
EPA ID No.: IL6 890 030 046

Dear Mr. Hersemann:

On April 20, 2016 a representative of the U.S. Environmental Protection Agency inspected the United States Department of Energy Fermi National Accelerator Laboratory (Fermilab) facility, located in Batavia, Illinois. The purpose of the inspection was to evaluate Fermilab's compliance with its hazardous waste storage permit and certain provisions of the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. § *6901 et seq.* (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Fermilab, EPA's review of records pertaining to Fermilab, and the inspector's observations, EPA has determined that Fermilab is in violation of its hazardous waste storage permit (Permit #IL6890030046), which references certain requirements of the Illinois Administrative Code (Ill. Admin. Code), as well as certain RCRA regulations set forth in the Code of Federal Regulations (CFR).

1. The Permittee shall conduct personnel training as required by 35 Ill. Admin. Code 724.116 and shall maintain training documents and records as required by 35 Ill. Admin. Code 724.116(d) and (e). See, Permit IL6890030046, Section II, paragraph 34.

At the time of the inspection, Fermilab did not have documentation demonstrating that facility personnel Greg Thompson and Jon Ylinen took part in an annual review of the required hazardous waste training for the year 2013. Fermilab, therefore, failed to comply with the above-referenced permit requirement.

Universal Waste Requirement

2. A small quantity handler of universal waste must manage any lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See Ill. Admin. Code 35 § 733.13(d)(1) [40 CFR § 273.13 (d)(1)],

   At the time of the inspection, Fermilab was storing waste lamps in four open containers.

During the inspection, as observed by EPA, you took certain actions to establish compliance with violation number 2.

According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. CFR § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, you have taken related to violation 1.

You should submit your response to Sheila Burrus, U.S. Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME:	United States Department of Energy Fermi National Accelerator Laboratory (Fermilab)
U.S. EPA ID. No.:	IL6 890 030 046
LOCATION ADDRESS:	Kirk Road and Pine Street Batavia, Illinois 60510
DATE OF INSPECTION:	April 20, 2016
U.S. EPA INSPECTOR:	Sheila Burrus

PREPARED BY:

Sheila Burrus
Environmental Protection Specialist

5/4/16
Date:

REVIEWED BY:

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

5/5/16
Date:

Purpose of Inspection

The purpose of the inspection was to conduct an un-announced compliance evaluation inspection (CEI) at the United States Department of Energy Fermi National Accelerator Laboratory (Fermilab), located at Kirk Road and Pine Street, Batavia, Illinois, to evaluate Fermilab's compliance with its hazardous waste storage permit and certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the management of hazardous and universal waste and used oil. The U.S. EPA OECA Small Business Resource Information Sheet, the Keys to Success brochure, the U.S. EPA – Region 5 Pollution Prevention Technical Assistance Contacts list and the U.S. EPA Managing Used Oil Advice for Small Business brochure were given to Dave Hockin.

Participants: Dave Hockin and Rick Hersemann represented Fermilab. Sheila Burrus represented EPA Region 5.

Installation Description/Background

Fermilab is a high energy physics research facility recognized for its research in the acceleration and collision of subatomic particles. Fermilab's 6,800-acre site is located in Batavia, Illinois and is managed by the Fermi Research Alliance. Thousands of scientists from universities and laboratories around the world collaborate at Fermilab on experiments at the frontiers of discovery.

Fermilab is a permitted treatment storage and disposal facility (TSDF). Fermilab's Part B permit allows for the storage of hazardous waste for up to one year. Fermilab's permit was first issued by the Illinois Environmental Protection Agency (IEPA) on September 23, 1991. The permit became effective on October 28, 1991. The permit expired on November 28, 2001. The IEPA reissued Fermilab a hazardous waste storage permit on June 30, 2006. The permit became effective on August 4, 2006. The permit was modified on October 24, 2013. The permit will expire on August 4, 2016.

The hazardous waste storage area is the centralized point for temporary and long term storage of chemical waste generated on site. The hazardous waste storage area consist of a three building complex referred to as Site 55. Buildings WS-1 and WS-2 East and West are used for less than 90 day storage of hazardous and non-hazardous waste. Building WS-3 is the permitted hazardous waste storage unit for the storage of solid and liquid hazardous waste, mixed waste (radioactive and hazardous) and PCB waste for up to one year. The site is surrounded by a six-foot tall chain link security fence.

Fermilab also operates as a large quantity generator of hazardous waste. Hazardous waste is generated at various locations across the Fermilab campus from research projects, maintenance of equipment that supports Fermilab's particle accelerators, and remediation activities.

Fermilab was last inspected by the Illinois Environmental Protection Agency for compliance with RCRA on June 3, 2015.

Waste Generation

Fermilab's hazardous waste, mixed waste (radioactive/hazardous materials), and PCB-waste are generated from on-site development, production and maintenance of materials and equipment. Ferimlab generates lead contaminated liquids/solids (D008) from its lead machining process and spill cleanup debris. Mercury contaminated solids and devices (D009) are generated from spill cleanup debris and replacement of failed devices. Mixed waste electrolyte solution (D002) is generated from the drainage of lead acid batteries. Mixed waste lead solids (D008) is generated from equipment. PCB (non-RCRA regulated) waste includes transformer dielectric oil and contaminated solids. Fermilab also generates waste petroleum naphtha (D039) from a parts washer located in the vehicle maintenance building.

Fermilab also generates medical waste (flu shots) from its day care center, used oil/filters from vehicle maintenance and universal waste.

Opening Conference

I arrived at Fermilab's security check point at 8:30 a.m. on April 20, 2016 and introduced myself and presented my enforcement credentials and explained my visit. When Mr. Hockin arrived to assist me, I presented my enforcement officer credentials to him and explained that I was there to conduct a compliance evaluation inspection.

I followed Mr. Hockin in my vehicle to Site 40, where the offices of the Hazardous Control Technology Team as well as the records are located. Mr. Hockin and I convened in a conference room where I explained to him that I would like to conduct a CEI that included a records review and visual site inspection of the facility. I then conducted the opening conference with Mr. Hockin and explained to him what specific records I would need to review. We were later joined by Rick Hersemann.

We discussed the various hazardous and non-hazardous waste streams generated on-site, as well as the employees that handle and manage the hazardous waste.

Fermilab's hazardous waste, mixed waste and PCB waste is picked up and disposed of by Veolia ES Technical Solutions, located in Menomonee Falls, Wisconsin. Heritage Crystal-Clean, LLC located in Monee, Illinois picks up its used oil. Fermilab takes its universal waste lamps to Fluorecycle located in Ingleside, Illinois for recycling. Fermilab ships its universal waste batteries to Batteries Solutions, located in Howell, Michigan for recycling.

I informed Mr. Hockin that Fermilab could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal communication, documents, and photographs. Fermilab did not make a CBI claim on the information gathered during the inspection.

Records Review

I began the CEI by conducting the records review portion of the inspection. I was assisted by Mr. Hockin during the records review portion of the inspection.

I informed Mr. Hockin that I wanted to review hazardous waste manifests, land disposal restriction forms, waste analysis reports, biennial reports, hazardous waste training records, current contingency plan and weekly container logs for the hazardous waste storage area.

My observations are categorized below:

Contingency Plan

I reviewed the contingency plan dated April 2001, Revision 7 and found it to be complete.

Training Records

I requested training records for Messrs. Hockin, Thompson and Ylinen for the years of 2013 through 2015. These three employees are responsible for the handling and management of hazardous waste on-site.

I reviewed training records for Mr. Hockin and found them to be complete. The records verified that Mr. Hockin received adequate RCRA training on an annual basis during the years above.

I reviewed training records for Messrs. Thompson and Ylinen for the years 2013 and 2015 and found them to be complete. There were no available records for the year 2014 for Messrs. Thompson and Ylinen. I received a phone call from Mr. Hockin on April 28, 2016 to inform me that Messrs. Thompson and Ylinen did not complete the RCRA annual hazardous waste training in the year 2014.

I also reviewed job descriptions for the above employees and found them to be complete.

Manifests

The last RCRA CEI was conducted on June 3, 2015. I reviewed manifests and land disposal restriction notification forms for the shipment of hazardous waste during the months of July through March 2016 and did not observe any deficiencies. The records were being well maintained.

Weekly Inspection Logs

I reviewed weekly hazardous waste storage inspection logs for Buildings WS-1, WS-2 and WS-3 and found them to be well documented and maintained.

Biennial Report

I reviewed Fermilab's Hazardous Waste Annual Report for the reporting year of 2015. The report was dated January 22, 2016. It includes a current closure cost estimate of $234,865 for the permitted hazardous waste storage area. Fermilab is not required to have financial assurance mechanisms as a federal facility.

Waste Analysis

Fermilab relies upon the generator's knowledge of the waste, MSDS data, as well as analytical testing when characterizing waste streams.

Visual Site Inspection (VSI)

After completion of the records review, I was accompanied by Messrs. Hockin and Hersemann during the VSI portion of the inspection. The areas of the Fermilab facility that I inspected included, but were not limited to: buildings WS-1, WS-2 (east/west), WS-3 (hazardous waste storage area or site 55), vehicle maintenance building, Site 38 (universal waste), battery sorting area, and lab 7 (Thin Film Village Lab).

The following is a summary of information obtained while touring the above areas.

The tour began in building WS-3, permitted storage building where hazardous waste may be stored up to one year. I observed three 30-gallon containers of electrolyte etch (D002) stored in 65-gallon over packed containers (Photographs 1 and 2). I also observed one, 55-gallon container of PCB waste and one flammable storage cabinet with mercury containing equipment

and thermometers (Photographs 3 and 4). There was also an empty mixed waste storage cabinet. All containers and cabinets were closed and labeled. The entire floor of WS-3 is constructed of reinforced concrete, epoxy-coated and free of cracks. It is also equipped with a four-inch berm.

We proceeded to building WS-1, where I observed four flammable storage cabinets. Three of the cabinets were storing aerosol cans, used ethanol and piperidine. The fourth cabinet was empty at time of inspection. I also observed two containers and one pallet of lead batteries (Photographs 5 through 7).

Next, we proceeded to WS-2 (East) where I observed one 30-gallon/one 55-gallon container of used oil and one 5-gallon container of special (oily sludge) waste (Photographs 8 through 10). There were also two 55-gallon containers of lead paint, four 55-gallon containers of coolant/oily diesel fluid and one 30-gallon container of oily rags (Photographs 11 through 14). All containers were closed and labeled.

After inspecting WS-2 (East), we proceeded to WS-2 (West) where I observed the following:

- There was one closed/labeled 55-gallon container of non-halogenated solvent waste rags being stored with the waste codes of, "D002, F003 and F005" (Photograph 15).

- There was one closed/labeled 55-gallon container of alcohol ethyl isopropyl waste rags being stored with the waste codes of, "D002 and F003" (Photograph 15).

- There were two closed/labeled 1-gallon containers hydrofluoric acid being stored inside a 20-gallon secondary containment container (Photograph 16).

- There were two closed/labeled 5-gallon containers of low ph rinse water and one 1-liter container of formic acid located in an acid/corrosive storage cabinet (Photograph 17).

- There were three closed/labeled bottles of dichloromethane waste being stored in cabinet 10 (Photograph 18).

- There were closed/labeled small containers of hazardous waste with the waste code of D002 being stored in cabinet 12 (Photograph 19).

- There was also one 55-gallon container of batteries generated from computers laptops, etc. (Photograph 20).

The concrete floors in WS-1 and WS-2 East and West are epoxy-coated, free of cracks and well maintained.

We continued the inspection at the vehicles maintenance building where a parts washer is located (Photograph 21). The parts washer is serviced by Safety Kleen. There were also non-hazardous waste containers and empty containers being stored as well.

We then proceeded to Site 38, the designated storage area for universal waste lamps. I observed four open containers and one closed 55-gallon container of waste lamps (Photographs 22 through 25). The four open containers were closed at the time of the inspection (Photographs 26 and 27). All containers were labeled universal waste lamps.

Next, we proceeded to the battery sorting area (ME-7 Worm) and then to the Thin Film Village Lab where I observed a satellite accumulation container of eight 1-liter bottles of ethanol waste and a bag of waste rags (Photographs 28 through 31).

Closing Conference

In closing, a brief conference was held. I summarized where Messrs. Hockin and Hersemann had taken me during the VSI and what information Mr. Hockin presented to me during the records review. I thanked them for their cooperation and concluded the CEI at appropriately 2:05 p.m.

Attachment

Inspection Checklist
Photographs 1 through 31

PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-3
SCENE BEING PHOTOGRAPHED:	permitted hazardous waste storage unit
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 2

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-3
SCENE BEING PHOTOGRAPHED:	closed/labeled containers of electrolyte etch stored inside over packed containers pvacked containers
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-3
SCENE BEING PHOTOGRAPHED:	one 55-gallon container of PCB waste
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 4

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-3
SCENE BEING PHOTOGRAPHED:	thermometer and mercury containing equipment
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 5

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-1
SCENE BEING PHOTOGRAPHED:	90-day hazardous waste storage buidling
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 6

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-1
SCENE BEING PHOTOGRAPHED:	aerosol cans, used ethanol, piperidine
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 7

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-1
SCENE BEING PHOTOGRAPHED:	two containers and one pallet of lead batteries
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 8

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	90 day hazardous waste storage building
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 9

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	closed/labeled 30 gallon container and 55-gallon container of used oil closed/labeled 5-gallon container of special waste (oily sludge)
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 10

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	5-gallon container of special waste (oily sludge)
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 11	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	closed/labeled 55-gallon container of waste paint
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 12
NAME OF PHOTOGRAPHER: Sheila Burrus
DATE OF PHOTOGRAPH: April 20, 2016
LOCATION OF PHOTOGRAPH: Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED: closed/labeled 55-gallon container of waste paint
SITE LOCATION: 1375 N. Meacham Road
Schaumburg, IL 60173
INSTALLATION NAME: Fermilab
INSTALLATION I.D. # ILR000056689

PHOTOGRAPH: 13	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	closed/labeled four 55-gallon containers of coolant/oily dry disel fluid
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 14

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (East)
SCENE BEING PHOTOGRAPHED:	30-gallon container of oily rags
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 15

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	two closed/labeled 55-gallon containers of contaminated rags
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 16

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	two closed/labeled 1-gallon containers of hydrofluoric acid
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 17

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	two 5-gallon containers of low ph rinse water and one 1-liter container of formic acid stored in box
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

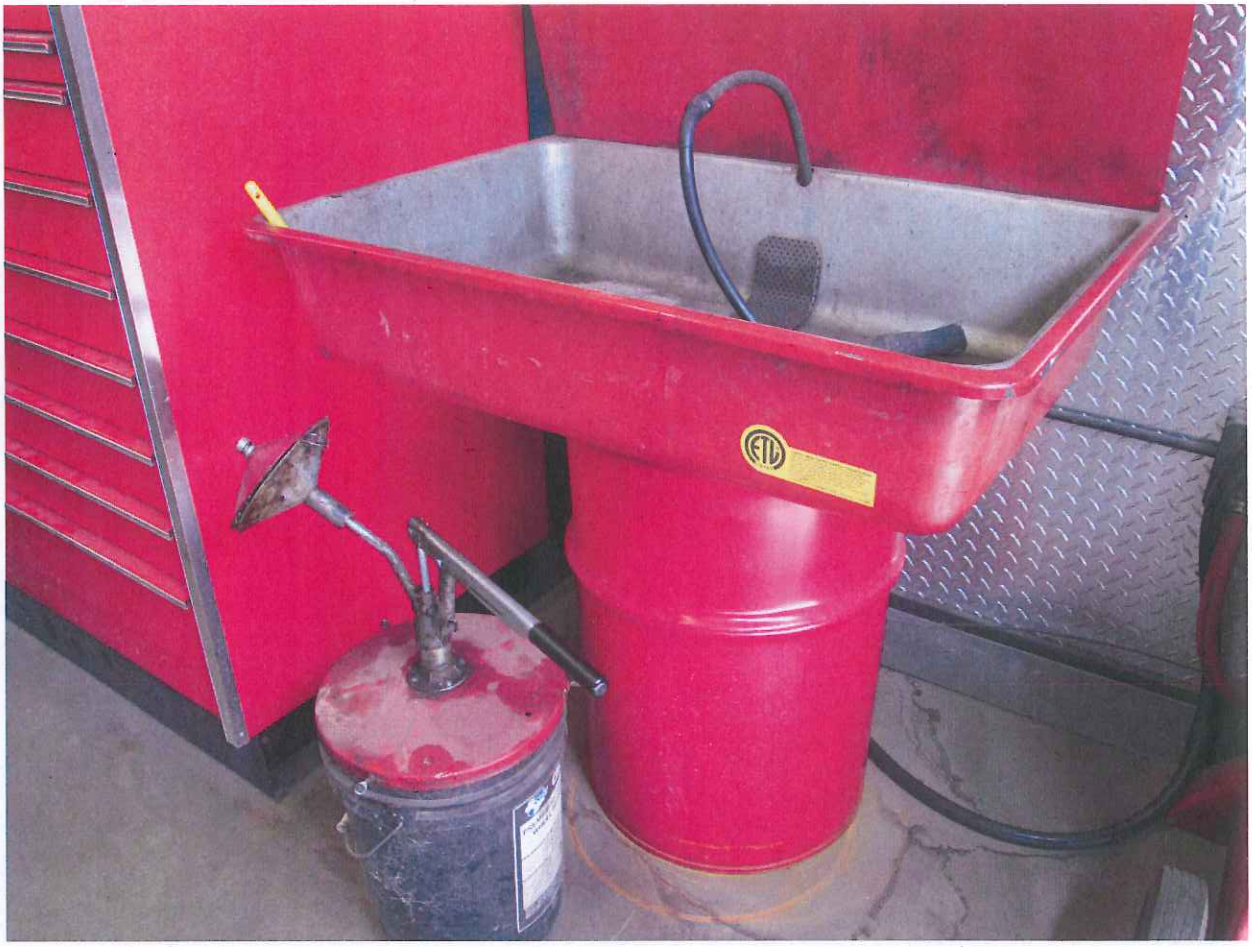
PHOTOGRAPH: 18

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	three 3-quart bottles of dichloromethane waste
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 19	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	closed/labeled two 5-gallon container of lithium hydroxide, 1-gallon container of aminomethyl, two 4 oz bottles of expired waste and one 500 ml of rinse water
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 20

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 55, WS-2 (West)
SCENE BEING PHOTOGRAPHED:	55-gallon container of waste batteries
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689



PHOTOGRAPH: 21

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Vehical Maintenance Building
SCENE BEING PHOTOGRAPHED:	Safety Kleen Parts Washer
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 22

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	open container of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 23	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	open container of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 24

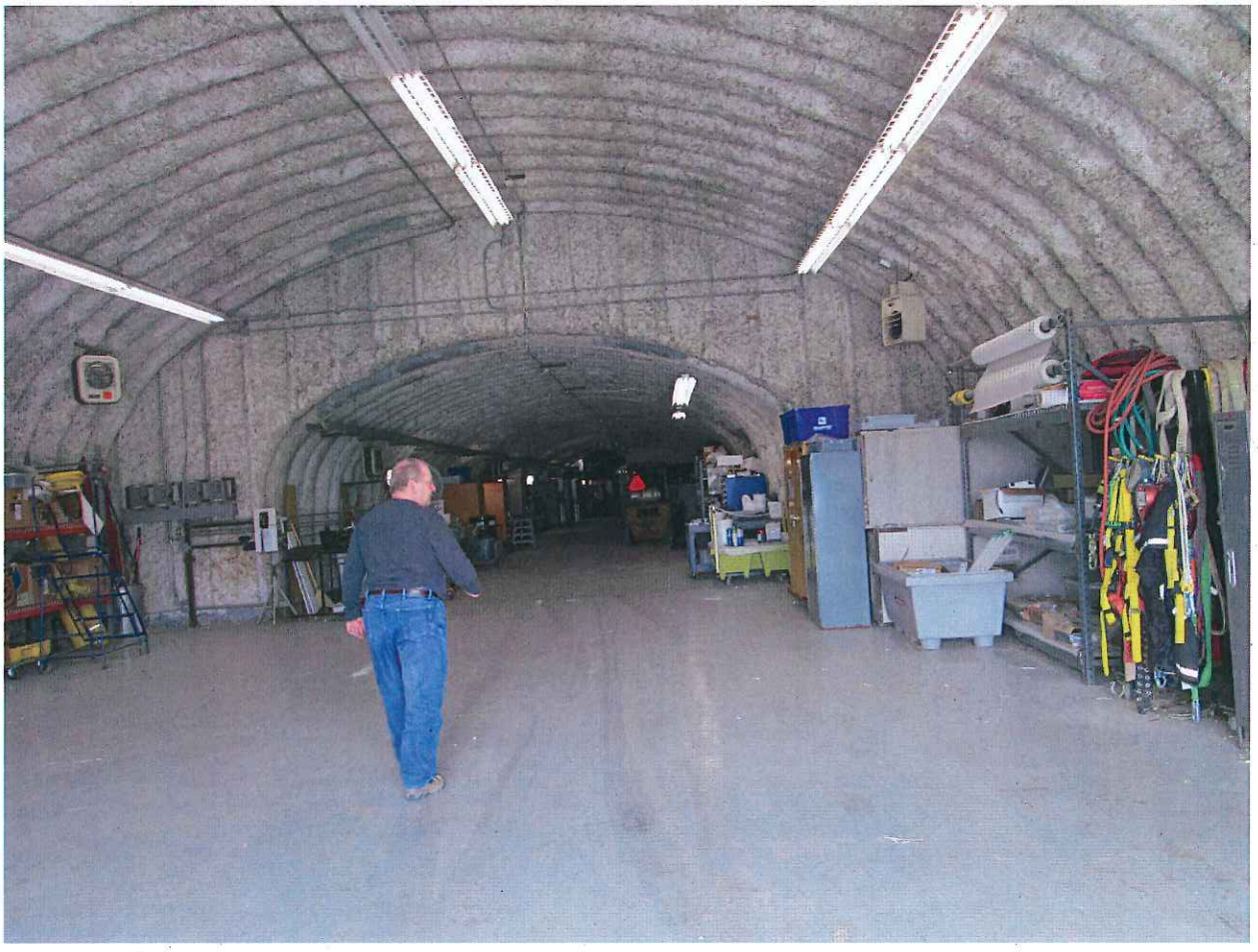
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	open containers of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 25	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	closed/labeled 55-gallon container of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 26

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	closed containers of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 27	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Site 38, Universal Waste Lamps
SCENE BEING PHOTOGRAPHED:	closed containers of waste lamps
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689



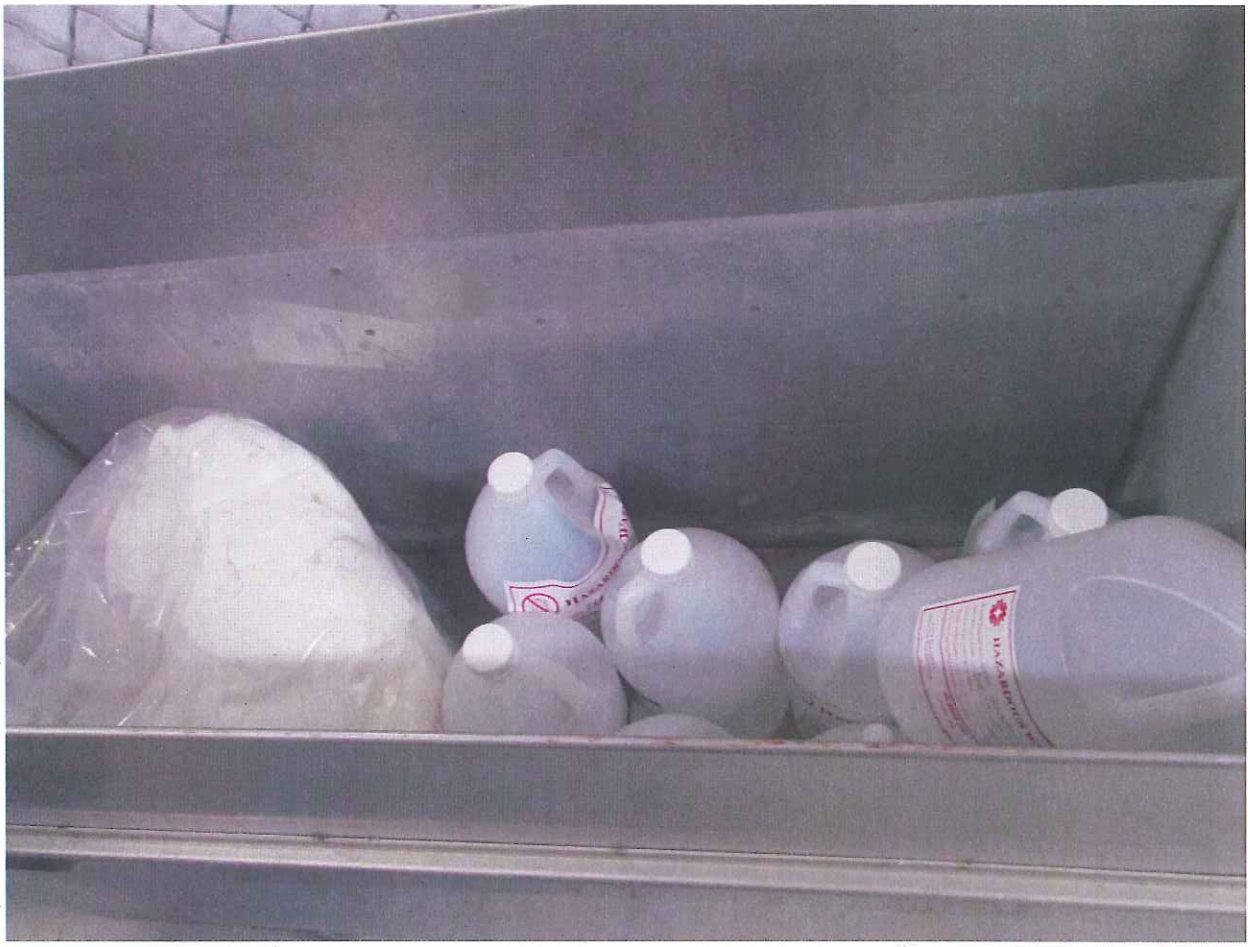
PHOTOGRAPH: 28

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	ME-7 Worm, Battery Sorting Area
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 29	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	ME-7 Worm
SCENE BEING PHOTOGRAPHED:	Battery Sorting Area
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

PHOTOGRAPH: 30

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Lab 7, Thin Film Village Lab
SCENE BEING PHOTOGRAPHED:	satellite accumulation container
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689



PHOTOGRAPH: 31

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	April 20, 2016
LOCATION OF PHOTOGRAPH:	Lab 7, Thin Film Village Lab
SCENE BEING PHOTOGRAPHED:	closed/labeled eight 1-gallon satellite accumulation container of ethanol waste and one-gallon container of isopropyl alcohol and waste rags
SITE LOCATION:	1375 N. Meacham Road Schaumburg, IL 60173
INSTALLATION NAME:	Fermilab
INSTALLATION I.D. #	ILR000056689

FERMILAB

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No ____ N/A ____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No ____ N/A ____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No ____ N/A ____	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No ____ N/A ____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No ____ N/A ____	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No ____ N/A ____	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No ____ N/A ____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ____ No ✓ N/A ____	722.120(b)
	Section 722.121 Acquisition of Manifests	722.120(d)
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No ____ N/A ____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes ✓ No ____ N/A ____	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes ✓ No ____ N/A ____	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No ____ N/A ____	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes ✓ No ____ N/A ____	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____ N/A ____	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes ✓ No ____ N/A ____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No ____ N/A ____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes ✓ No ____ N/A ____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ____ No ____ N/A ✓	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes____ No ✓ N/A____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes____ No____ N/A____	722.130
	Section 722.134 Accumulation Time	
(722.134(a))	Has the generator complied with the following requirements: Yes____ No____ N/A____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes ✓ No____ N/A____ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes____ No____ N/A ✓ and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A ✓ and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A____	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ✓ No____ N/A____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ✓ No____ N/A____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes ✓ No____ N/A____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes ✓ No____ N/A____ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? 10 years exp 10 Yes ✓ No____ N/A____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes ✓ No____ N/A____	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes ✓ No____ N/A____	
(725.272)	Is the waste compatible with the container and/or liner? Yes ✓ No____ N/A____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes ✓ No____ N/A____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes ✓ No_____ N/A_____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes ✓ No_____ N/A_____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes ✓ No_____ N/A_____ **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes ✓ No_____ N/A_____ COMMENTS:	
(725.278)	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes ✓ No_____ N/A_____ Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes_____ No ✓ N/A_____ **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes_____ No_____ N/A_____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	725.214
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	
(725.293(c))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	

NO TANKS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes_____ No_____ N/A_____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes_____ No_____ N/A_____ 2) Are welded flanges, joints and connections inspected daily? Yes_____ No_____ N/A_____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes_____ No_____ N/A_____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes_____ No_____ N/A_____	
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____ 2) overfill prevention controls? Yes_____ No_____ N/A_____ 3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
(725.294(c))	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____ 2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____ 3) data from monitoring equipment? Yes_____ No_____ N/A_____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A_____ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
	Section 725.302 Air Emission Standards	
(725.302)	Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes ✓ No____ N/A____	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ - agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes____ No ✓ N/A____ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A____	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes ✓ No____ N/A____ - explosions? Yes ✓ No____ N/A____ - releases? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes ✓ No N/A - hospitals? Yes ✓ No N/A - contractors? Yes ✓ No N/A - emergency response teams? Yes ✓ No N/A	
(725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No N/A	
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes ✓ No N/A - capability? Yes ✓ No N/A - location? Yes ✓ No N/A Is the list of emergency equipment up-to-date? Yes ✓ No N/A	
(725.152(f))	Does the plan include: - an evacuation plan? Yes ✓ No N/A - an evacuation signal? Yes ✓ No N/A - alternate evacuation routes? Yes ✓ No N/A	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes ✓ No N/A b) submitted to: - police department? Yes ✓ No N/A - fire department? Yes ✓ No N/A - hospital? Yes ✓ No N/A - emergency response teams? Yes ✓ No N/A	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes ✓ No N/A b) the plan fails in an emergency? Yes ✓ No N/A c) the facility changes in a way that modifies the emergency response necessary? Yes ✓ No N/A d) information regarding emergency coordinators changes? Yes ✓ No N/A e) information regarding equipment changes? Yes ✓ No N/A	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes ✓ No N/A Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No N/A Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No N/A	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this section been followed regarding assessment, response and reporting? Yes No ✓ N/A **Note:** If the facility has had a release, explain in detail.	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No____ N/A____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No____ N/A____ Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____ - key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____ - communications or alarm systems? Yes ✓ No____ N/A____ - response to fire or explosions? Yes ✓ No____ N/A____ - response to groundwater contamination incidents? Yes ✓ No____ N/A____ - shutdown of operations? Yes ✓ No____ N/A____	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes____ No____ N/A____	No annual H.W. training for 2 employees in the year 2013
(725.116(c))	Have facility personnel received an annual review of the initial training? Yes____ No ✓ N/A____	
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No____ N/A____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____ Is the plan on-site? Yes ✓ No____ N/A____ Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes ✓ No____ N/A____ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes____ No____ N/A____	
722.134(c)	**Section 722.134 Satellite Accumulation** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes ✓ No____ N/A____ If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes ✓ No____ N/A____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes ✓ No____ N/A____	
722.134(g)	**Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
722.141(a)	**Section 722.141 Annual Reporting** Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____ **Note:** If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No_____ N/A_____	722.141(b)
	Section 722.142 Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes_____ No_____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes_____ No_____ N/A_____	722.142(a)(2)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes_____ No_____ N/A ✓	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A_____	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A_____	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes_____ No ✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A_____	722.170
	COMMENTS:	

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